

**Elisha Kobre**

Partner

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## MEMORANDUM ENDORSED

July 6, 2023

### **VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 7/10/2023

**Re: *United States v. Srinivasa Kakkera, 22 Cr. 398 (GHW)***

Dear Judge Woods:

I write on behalf of defendant Srinivasa Kakkera to respectfully request, without objection by Pretrial Services, a modification of Mr. Kakkera's conditions of release to allow him to travel, between the dates of July 14, 2023 and August 2, 2023, to several states within the Northeast, specified below, for a variety of reasons, including: his appearance at the motions hearing currently scheduled before this Court for July 19, 2023, to visit several universities throughout the Northeast with his children, to visit with family, and as a general family vacation.

As the court is aware, a hearing on Mr. Kakkera's pretrial motions is currently scheduled for July 19, 2023. Mr. Kakkera, who currently resides in California, would like to take the opportunity, while he is in New York for the court appearance, to travel more generally within the Northeast for several other purposes. In particular, Mr. Kakkera would like to travel to and within the states of New York, New Jersey, Virginia, Massachusetts, Pennsylvania, and to Washington D.C. The purposes of this travel include: visiting several northeast universities with his children, visiting with family, and as a general family vacation. The travel would all take place within the period from July 14, 2023 through August 2, 2023.

I have corresponded via e-mail with Brad Wilson, Mr. Kakkera's pretrial services in the Northern District of California, who supports this request. I have also corresponded with Viosanny Harrison, Mr. Kakkera's pretrial services officer in the Southern District of New York, who likewise does not object to this requested modification. I have also corresponded via e-mail with AUSA Adam Hobson, and the Government likewise does not object to the requested modification. Mr. Kakkera will provide any details requested of him by his Pretrial Services Officers in advance of his travel.

I therefore respectfully request that the Court modify Mr. Kakkera's conditions of release to allow him to travel, between the dates of July 14, 2023 and August 2, 2023, to and within the states of New York, New Jersey, Virginia, Massachusetts, Pennsylvania, and to Washington DC for the purposes described above.

The Honorable Gregory H. Woods

July 6, 2023

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Sincerely,



Elisha Kobre

Application granted. The conditions of Mr. Kakkera's pre-trial release are modified as follows: Mr. Kakkera may travel to and within Washington D.C. and the states of New York, New Jersey, Virginia, Massachusetts, and Pennsylvania between July 14, 2023 and August 2, 2023. Mr. Kakkera is directed to provide a detailed itinerary for his travel to pretrial services, as well as contact information during his travel. All other conditions of the defendant's pre-trial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 89.

SO ORDERED.

Dated: July 10, 2023  
New York, New York



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GREGORY H. WOODS  
United States District Judge